

# **EXHIBIT B**



TAX IDENTIFICATION NO: 23-0382195

919 North Market Street, 11th Floor  
Wilmington, DE 19801-3034  
Tel 302.252.4465  
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Paul E. Harner  
1675 Broadway  
New York, NY 10019

July 22, 2022  
Invoice No. 20220704212

Client: Sears Fee Examiner (071820.03)  
Matter: Fee and Expense Review and Reporting (00317415)

FOR PROFESSIONAL SERVICES RENDERED through June 30, 2022

#### INVOICE SUMMARY

Professional Fees	\$29,803.50
<b>Total Invoice Amount</b>	<b>\$29,803.50</b>

071820.03 - 00317415  
Tobey M. Daluz

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**Professional Services**

Attorney	Date	Description	Rate	Hours	Amount
<b>B160 - Fee/Employment Applications</b>					
Vesper,M.A.	06/22/22	E-mail P. Harner, T. Daluz, and C. McClamb re: Sheppard Mullin invoices	470.00	0.10	47.00
Daluz,T.M.	06/23/22	Attend to monthly fee application	1,030.00	0.50	515.00
Vesper,M.A.	06/23/22	Draft thirty-sixth monthly joint fee application	470.00	0.20	94.00
Vesper,M.A.	06/28/22	Draft thirty-sixth monthly joint fee application	470.00	0.30	141.00
Daluz,T.M.	06/29/22	Review monthly fee application	1,030.00	0.50	515.00
Daluz,T.M.	06/30/22	Attend to fee examiner monthly fee application	1,030.00	0.10	103.00
<b>Total B160</b>				<b>1.70</b>	<b>1,415.00</b>
<b>B170 - Fee/Employment Objections</b>					
Daluz,T.M.	06/01/22	Review docket re: recent filings	1,030.00	0.20	206.00
Daluz,T.M.	06/01/22	Review Weil monthly fee application	1,030.00	0.20	206.00
Daluz,T.M.	06/01/22	Correspondence with fee examiner re: same	1,030.00	0.30	309.00
Daluz,T.M.	06/01/22	Review statement re: ordinary course professionals	1,030.00	0.10	103.00
McClamb,C.D.	06/01/22	Emails with T. Daluz re: retiree committee applications	655.00	0.10	65.50
Daluz,T.M.	06/02/22	Review motion of retiree committee to increase fee cap	1,030.00	0.20	206.00
Daluz,T.M.	06/02/22	Correspondence with fee examiner and C. McClamb re: same	1,030.00	0.30	309.00
Vesper,M.A.	06/02/22	Review e-mail from C. McClamb re: retiree committee's motion to increase fee cap	470.00	0.10	47.00
Pollard,C.P.	06/03/22	Prepare exhibits for Akin Gump fees and expenses - 11/1/2021 - 2/28/2022	350.00	0.80	280.00
McClamb,C.D.	06/03/22	Review Mulder retention application	655.00	3.00	1,965.00

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Attorney	Date	Description	Rate	Hours	Amount
McClamb,C.D.	06/03/22	Review and analyze motion to increase fee limit and retiree committee applications	655.00	1.30	851.50
Vesper,M.A.	06/03/22	Correspondence with C. McClamb and C. Pollard re: Akin exhibits	470.00	0.10	47.00
Daluz,T.M.	06/06/22	Correspondence with C. McClamb re: retiree committee counsel	1,030.00	0.20	206.00
McClamb,C.D.	06/06/22	Emails with T. Daluz re: retiree committee final applications	655.00	0.20	131.00
Vesper,M.A.	06/06/22	Draft report re: Wollmuth Maher & Deutsch LLP's final fee application	470.00	2.30	1,081.00
Vesper,M.A.	06/06/22	Review Akin Gump Strauss Hauer & Feld LLP tenth interim fee application time entries	470.00	1.40	658.00
Daluz,T.M.	06/07/22	Correspondence with fee examiner re: Judge assignment	1,030.00	0.30	309.00
Daluz,T.M.	06/07/22	Review docket re: recent pleadings	1,030.00	0.20	206.00
McClamb,C.D.	06/07/22	Emails with P. Harner, T. Daluz and M. Vesper re: judicial transition	655.00	0.20	131.00
McClamb,C.D.	06/07/22	Review Mulder retention application	655.00	4.00	2,620.00
Vesper,M.A.	06/07/22	Draft exhibit for interim report for Akin Gump Strauss Hauer & Feld LLP tenth interim fee application	470.00	2.00	940.00
McClamb,C.D.	06/08/22	Review Wollmuth retention application, final fee application and report	655.00	2.00	1,310.00
McClamb,C.D.	06/08/22	Review Mulder retention application and final fee application	655.00	3.00	1,965.00
McClamb,C.D.	06/09/22	Draft retiree committee report	655.00	2.50	1,637.50
McClamb,C.D.	06/13/22	Draft and edit combined report on Retiree Committee Final Applications	655.00	4.00	2,620.00
Daluz,T.M.	06/14/22	Review docket re: recent filings	1,030.00	0.20	206.00
Daluz,T.M.	06/14/22	Review Katten fee order	1,030.00	0.10	103.00
Daluz,T.M.	06/14/22	Review Stretto fee order	1,030.00	0.10	103.00

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Attorney	Date	Description	Rate	Hours	Amount
McClamb,C.D.	06/14/22	Emails with P. Harner, T. Daluz and M. Vesper re: retiree committee report	655.00	0.40	262.00
McClamb,C.D.	06/14/22	Phone call to Wollmuth re: retiree committee report	655.00	0.30	196.50
McClamb,C.D.	06/14/22	Phone call to Mulder re: retiree committee report	655.00	0.10	65.50
Vesper,M.A.	06/14/22	Review e-mails from P. Harner and C. McClamb re: retirees committee professionals report	470.00	0.10	47.00
Daluz,T.M.	06/15/22	Review docket re: recent filings	1,030.00	0.20	206.00
Daluz,T.M.	06/15/22	Review indenture trustee's objection to committee's motion to fund litigation	1,030.00	0.30	309.00
Daluz,T.M.	06/15/22	Review admin creditors' objection to committee's motion to fund litigation	1,030.00	0.10	103.00
Daluz,T.M.	06/15/22	Review Realtor's objection to committee's motion to fund litigation	1,030.00	0.20	206.00
Daluz,T.M.	06/15/22	Review Whitebox objection to committee's motion to fund litigation	1,030.00	0.10	103.00
Daluz,T.M.	06/15/22	Review admin creditors' (Orient Craft) objection to committee's motion to fund litigation	1,030.00	0.10	103.00
Daluz,T.M.	06/15/22	Correspondence with P. Harner and C. McClamb re: same	1,030.00	0.20	206.00
Daluz,T.M.	06/15/22	Review and comment on statement re: retiree committees' fees and request for increase in fee app	1,030.00	0.30	309.00
McClamb,C.D.	06/16/22	Emails with P. Harner and T. Daluz re: interim fee applications	655.00	0.20	131.00
McClamb,C.D.	06/16/22	Emails with T. Daluz re: interim fee hearing	655.00	0.20	131.00
Daluz,T.M.	06/21/22	Correspondence with C. McClamb re: filing of statement re: counsel for retirees	1,030.00	0.30	309.00
McClamb,C.D.	06/21/22	Emails with T. Daluz re: retiree committee report	655.00	0.20	131.00

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Attorney	Date	Description	Rate	Hours	Amount
McClamb,C.D.	06/22/22	Emails with P. Harner, T. Daluz and M. Vesper re: retiree committee report and applications	655.00	0.20	131.00
Daluz,T.M.	06/23/22	Review court's order approving retiree's fee application	1,030.00	0.10	103.00
Daluz,T.M.	06/23/22	Review FTI monthly fee application	1,030.00	0.20	206.00
Daluz,T.M.	06/23/22	Review notice re: adjournment of hearing in litigation funding	1,030.00	0.10	103.00
Daluz,T.M.	06/23/22	Review Herrick monthly fee application	1,030.00	0.20	206.00
Daluz,T.M.	06/24/22	Correspondence with C. McClamb and P. Harner re continuation of Drain	1,030.00	0.20	206.00
Daluz,T.M.	06/24/22	Review docket re: new filings	1,030.00	0.20	206.00
McClamb,C.D.	06/24/22	Emails with P. Harner and T. Daluz re: interim fee hearing	655.00	0.20	131.00
McClamb,C.D.	06/24/22	Emails with P. Harner and T. Daluz re: judicial transition	655.00	0.20	131.00
McClamb,C.D.	06/24/22	Review and summarize litigation funding motion and filed objections	655.00	4.00	2,620.00
Daluz,T.M.	06/28/22	Call with P. Harner re: status of chapter 11 and interim fee application hearing	1,030.00	0.50	515.00
Daluz,T.M.	06/28/22	Review docket re: new filings	1,030.00	0.20	206.00
Daluz,T.M.	06/28/22	Review Akin monthly fee application	1,030.00	0.20	206.00
Daluz,T.M.	06/28/22	Review Weil fee application	1,030.00	0.20	206.00
Daluz,T.M.	06/28/22	Review Herrick monthly fee application	1,030.00	0.20	206.00
McClamb,C.D.	06/28/22	Emails with P. Harner and T. Daluz re: continued hearings	655.00	0.60	393.00
Vesper,M.A.	06/28/22	Review e-mails from P. Harner, T. Daluz, and C. McClamb re: upcoming hearing	470.00	0.10	47.00
Daluz,T.M.	06/29/22	Review order re: Judge Drain	1,030.00	0.10	103.00
Daluz,T.M.	06/29/22	Correspondence with P. Harner re: recent fee applications and hearing continuances	1,030.00	0.20	206.00

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Attorney	Date	Description	Rate	Hours	Amount
Daluz, T.M.	06/29/22	Correspondence with C. McClamb re: correspondence with MIII	1,030.00	0.20	206.00
Daluz, T.M.	06/30/22	Review docket re: recent filings	1,030.00	0.20	206.00
Daluz, T.M.	06/30/22	Review Kroll monthly fee application	1,030.00	0.20	206.00
<b>Total B170</b>				<b>41.20</b>	<b>28,388.50</b>
<b>Total Fees</b>				<b>42.90</b>	<b>\$29,803.50</b>

### Summary of Professional Fees

Attorney	Billed Hours	Billed Rate	Billed Amount
Daluz, T.M.	8.50	1,030.00	8,755.00
McClamb, C.D.	26.90	655.00	17,619.50
Vesper, M.A.	6.70	470.00	3,149.00
Pollard, C.P.	0.80	350.00	280.00
<b>Total Fees</b>	<b>42.90</b>		<b>\$29,803.50</b>

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## REMITTANCE ADVICE

Professional Fees	\$29,803.50
<b>Total Invoice Amount</b>	<b>\$29,803.50</b>

For billing inquiries please send an email to [CB@ballardspahr.com](mailto:CB@ballardspahr.com)

Our Preferred Method for payment is ACH or Wire Transfer  
<https://ww2.payerexpress.com/ebp/BallardSpahr/Login/Index>

### For Payment by US mail:

Ballard Spahr LLP  
P O Box 825470  
Philadelphia, PA 19182 5470  
Tel 302.252.4465

### ACH and Wire Payment Instructions

Bank: PNC Bank, NA  
1600 Market Street, Philadelphia, PA 19103  
ABA No.: 031 0000 53  
Account No.: 85-3131-7345  
Account Name: Ballard Spahr LLP

Due and Payable Within 30 Days